

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLES TILL,)	
)	
Plaintiff,)	No.: 21-CV-1256
)	
NATIONAL GENERAL ACCIDENT AND)	Judge Thomas Durkin
HEALTH INSURANCE COMPANY,)	
)	
Defendant,)	

**PLAINTIFF'S UNOPPOSED MOTION TO STAY DISCOVERY PENDING RULING ON
DEFENDANT'S MOTION TO DISMISS**

NOW COMES Plaintiff, CHARLES TILL, by and through his attorneys, The Kreamer Law Group, and for his Unopposed Motion to Stay discovery Pending the Ruling On Defendant's Motion to Withdraw its Answer and Motion to Dismiss Plaintiff's Complaint, states as follows:

1. Defendant previously filed a motion to withdraw its Answer and Motion to Dismiss Plaintiff's Complaint for lack of subject matter jurisdiction.
2. The motions have been fully briefed pursuant to this Court's 8/27/21 order.
3. This Honorable Court previously entered an order setting discovery deadlines on 5/21/21.
4. The parties have since exchanged Rule 26a Disclosures and written discovery requests. Defendant has answered written discovery requests. Plaintiff has prepared responses to the same and as of preparing this motion the responses are out for final review and signature.
5. In light of the pending ruling on the Motion to Withdraw and Dismiss, the parties believe it is prudent to stay further fact discovery at this time, pending the outcome of the motions.
6. A granting of this motion would not cause any undue delay in this matter.

7. Counsels have discussed this motion, and Plaintiff's counsel forwarded a copy of the same prior to filing it to Defendant's counsel. Defendant's counsel has indicated he does not oppose the relief sought herein.

WHEREFORE, Plaintiff prays that this honorable Court grant this motion and issue a stay on any further fact discovery at this time, and for any further relief the Court deems appropriate and just.

Respectfully submitted,

CHARLES TILL

By: /s/ Joseph E. Urani
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 11, 2021, he electronically filed Plaintiff's Unopposed Motion to Stay with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following registered CM/ECF participant(s):

To: Dennis Berg, Esq.
PIPAL & BERG, LLP
100 S. Wacker Drive
Suite 900
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/s/ Joseph E. Urani